

Pro Se 15 (Rev. 12/16) Complaint for Violation of Civil Rights (Non-Prisoner)

UNITED STATES DISTRICT COURT

for the

US District of Oregon

Portland Division

Case No. 3:20-cv-00859 JR

(to be filled in by the Clerk's Office)

Leanne J. Hensley

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Oregon Department of Justice

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Leanne J. Hensley		
Address	PO Box 6166		
	Bend	Oregon	97708
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Deschutes		
Telephone Number	503 741 1616		
E-Mail Address	leannejhensley@gmail.com		

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	Frederick Boss		
Job or Title <i>(if known)</i>	Oregon DOJ - Deputy Attorney General		
Address	Oregon Department of Justice / 1162 Court St. NE		
	Salem	Oregon	97031
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Marion		
Telephone Number	503-378-6002		
E-Mail Address <i>(if known)</i>	Fred.Boss@doj.state.or.us		
<input checked="" type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 2

Name	Rich Austria		
Job or Title <i>(if known)</i>	Oregon DOJ - Hate Crimes Investigator		
Address	Oregon Department of Justice / 1162 Court St. NE		
	Salem	Oregon	97031
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Marion		
Telephone Number	503-378-6347		
E-Mail Address <i>(if known)</i>	president@orhia.com / rich.austria@doj.state.or.us		
<input checked="" type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity			

Defendant No. 3

Name	Fay Stetz-Waters		
Job or Title <i>(if known)</i>	Civil Rights Director Office of the Attorney General		
Address	Oregon Department of Justice / 1162 Court St. NE		
	Salem	Oregon	97031
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Marion		
Telephone Number	503-378-6002		
E-Mail Address <i>(if known)</i>	Fay.Stetz-Waters@doj.state.or.us		
	<input checked="" type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity		

Defendant No. 4

Name	Renee Stineman		
Job or Title <i>(if known)</i>	Chief Counsel of Oregon General Counsel Division		
Address	Oregon Department of Justice / 1162 Court St. NE		
	Salem	Oregon	97708
	<i>City</i>	<i>State</i>	<i>Zip Code</i>
County	Marion		
Telephone Number	503-378-6002		
E-Mail Address <i>(if known)</i>	renee.stineman@doj.state.or.us		
	<input checked="" type="checkbox"/> Individual capacity <input checked="" type="checkbox"/> Official capacity		

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against *(check all that apply)*:

☒ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

~ OPEN Violation of: 42 U.S.C as Codified, 1983/1985/1986/1988 / Convention on the Prevention and Punishment of the Crime of Genocide, as Approved and proposed for signature and ratification or accession by General Assembly resolution 260 A (III) of 9 December 1948 Entry into force: 12 January 1951, in accordance with article XIII / The United Nation's: Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT ratified 1986) / The UN's: International Covenant on Civil and Political Rights (CCPR, ratified 1971) / Base Statutes under the International Law Commission / Base Statutes under the International Wrongful Act of a State (IIC/IWAS) / 1st & 8th Amendment to the U.S. Constitution / H.R. 5602, Domestic Terrorism Prevention Act of 2020 / AMENDMENTS TO THE CONSTITUTION OF THE UNITED STATES - Articles: Amendment #I, Amendment #IV, Amendment #V, Amendment #VI, Amendment #VII, Amendment #VIII, Amendment #IX, Amendment #XI, Amendment #XIII, Section 1 & 2; Amendment #XIV, Section 1; Amendment #XV, Section 1 & 2 / CONSTITUTION OF OREGON Art. I§11 - ARTICLE I BILL OF RIGHTS: SEC. 1, 2, 3, 8, 9, 10, 11, 13, 14, 15, 16, 18, 20, 23,24, 29, 33, 34, 41, 42, 43, 46.

- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

~ OPEN Violation of: 42 U.S.C as Codified, 1983/1985/1986/1988 / Convention on the Prevention and Punishment of the Crime of Genocide, as Approved and proposed for signature and ratification or accession by General Assembly resolution 260 A (III) of 9 December 1948 Entry into force: 12 January 1951, in accordance with article XIII / The United Nation's: Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (CAT ratified 1986) / The UN's: International Covenant on Civil and Political Rights (CCPR, ratified 1971) / Base Statutes under the International Law Commission / Base Statutes under the International Wrongful Act of a State (IIC/IWAS) / 1st & 8th Amendment to the U.S. Constitution / H.R. 5602, Domestic Terrorism Prevention Act of 2020 / AMENDMENTS TO THE CONSTITUTION OF THE UNITED STATES - Articles: Amendment #I, Amendment #IV, Amendment #V, Amendment #VI, Amendment #VII, Amendment #VIII, Amendment #IX, Amendment #XI, Amendment #XIII, Section 1 & 2; Amendment #XIV, Section 1; Amendment #XV, Section 1 & 2 / CONSTITUTION OF OREGON Art. I§11 - ARTICLE I BILL OF RIGHTS: SEC. 1, 2, 3, 8, 9, 10, 11, 13, 14, 15, 16, 18, 20, 23,24, 29, 33, 34, 41, 42, 43, 46.

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

*****Please see the Attached PDF: May 2020, Statement of Claim for: Civil Case Alleging Negligence for the Oregon Department of Justice

***Please Reference the Complaints/ Evidence given to State of Oregon Courts for:

- 1) Employment Discrimination from Nike / Civil Case Complaint
- 2) Employment Discrimination from ZGF Architects / Civil Case Complaint for ZGF Architects
- 3) Additional Complaint Violations Filed for the State of Oregon & the Oregon DOJ
- 4) Physical Case Files sent for: ZGF / Nike / State of Oregon & Oregon DOJ - dated 5.22.2020 in (2) boxes for ZGF Architects & Nike / (3) boxes for the State of Oregon & Oregon DOJ Case.

***Victim intends to Upload Additional important PDF Files for Judge Russo, via E-file Access, when given by the Court.

- 5) Official Complaints Filed for State & Federal Agencies, accessible via Digital Files sent to the Honorable Judge Russo on (3) copies of a USB, each one being it's own copy, for her convenience.

***I humbly ask the Honorable Judge Russo to Review ALL Digital Guide Word Documents for the entirety of L.Hensley Set of (3) Cases within Oregon Courts, regarding: a) Hate Crime, b) Blacklisting per Right to Sue x (2), & c) a Swatting Crime - each Document references Dropbox links (which were printed and sent to your Honor), containing Files of complete Importance, for such continued: sensitive, immoral & Unlawful Acts of Discrimination and HATE, which has resulted in SEVERE Human Rights Abuses, Civil Rights Abuses, Willful Medical Malpractice, Willful Legal Malpractice, and Willful Police Misconduct.

- Case Digital File links have been already shared with (4)+ Investigators, both State & Federal.
- For these reasons, & as per: CIA Case #P2019-00581 / CIA-IG Case #H20191964 / OGIS Case No. 19-03045 ~ I had kindly asked the Oregon Courts to SEAL these Court Filings & all Records sent for State or Federal Review of Unlawful Violations of Civil & Human Rights ~ as making this Information Public, would most DEFINITELY endanger my life, further than the heavy Oregon Police Gang-stalking I have endured for (2) years.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

- 1) Employment Blacklisting: Oregon - Statewide / PNW
- 2) A Hate Crime: Astoria Oregon
- 3) A Swatting Crime: Bend, OR / Salem, OR / assisted by City of Astoria City Counsel/Police Dept.

B. What date and approximate time did the events giving rise to your claim(s) occur?

- 1) Employment Blacklisting: I arrived to Oregon in Fall 2015. This violent behavior increased Approx. Mid-2016 & has increased every year heavily.
- 2) A Hate Crime in Astoria Oregon, related to the Ghadar Party & Oregon KKK roots - occurred June 2018 ~ HORRIFIC Acts of HATE/Human Rights Violation/Intimidation / Civil & Human Rights Violations have happened, due to Filing a Tort Claim for the Police Brutality in December 2018.
- 3) A Swatting Crime occurred from February - December 2019 ~ based in Oregon's KKK roots/foundational behavior & Aryan Nationalism for Society, which has modernized into White Nationalism/White Supremacy, supported by Nike's push for #blacksupremacy / White Nationalism in the Oregon Legal Field, Business Market, Sports Market & State Academics....all time of which was FILLED with daily Acts of HATE/Intimidation / Civil & Human Rights Violations, due to Filing a Tort Claim for the Ghadar Party-based HATE CRIME, celebrating Police Brutality in Astoria - in June 2018....and of which continues TODAY, daily.

C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

***Please Reference the Complaints/ Evidence given to State of Oregon Courts for:

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- 2) Employment Discrimination from ZGF Architects / Civil Case Complaint for ZGF Architects
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IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

~ I simply CAN NOT adequately portray in words, the TRAUMA of enduring YEARS of Oregon / PNW: White Supremacy/White Nationalism/Black Supremacy/Zionism/Orientalism - in addition to Unlawful Employment Blacklisting - based on my Asian Guyanese Indian Race/Credentials - is COMPLETELY indictive of SYSTEMIC RACISM in Oregon towards Asian Indians as per the Ghadar Party's Findings, due to the above listed ideologies, which are NOT broadcast to the Public, NOR is the "public narrative" CORRECT - as it is ALWAYS controlled by White or Black people!!!

~ I have endured HORRIFIC Medical Abuse, akin to NAZI Eugenics Methodology during the Swatting Crime - which has been Reported to the Oregon Nursing Board / OHA - and of which involves Unlawful Psychological manipulation, Nutrition Abuse to alter my genetics, Willful Prevention of Religious Practices, Willful Prevention of Athletic movement, Willful Emotional Abuse with regards to separation from Staff of Color & White Nationalism within OSH Staffing which was also Reported by other Staff; Willful REFUSAL to allow me access to an Asian Indian Medical Professional, who may sadly be a Hindu Nationalistic & support the Indian Caste System, further enabling WHITE SUPREMACY ABUSE - which is an UNSPOKEN current familial & Cultural OPPRESSION that I deal with in my immediate Indian family AND within the Oregon AEC Industry, due to (2) specific Hindu Indian Engineer #gatekeepers for #whitesupremacist ARCHITECTS through the State, which are all in SOME way - supported by Nike financially...whilst Native Americans are touted as "Indians" and protected in every way?!?!

The DETAILS Police Brutality from SEVERAL Brutal and RACISTLY driven Assaults, in order to File FALSE Reports to keep White Nationalism alive - has been Reported to:

- The DC DOJ: Criminal Section & the DOJ: Special Litigation Section
- The Oregon Department of Justice - June 6th, 2019...
- The Oregon Department of Public Safety Standards and Training (DPSST) - May 2020...
- Oregon Government Ethics Commission - May 2020...
- The Oregon State Board of Architect Examiners (Board/OSBAE) - May 2020...
- The Bend Police - Records & Evidence Program Manager: Brandie Swindle in February 2020
- The Oregon FBI - since April 2019 and CURRENTLY...
- The Central Intelligence Agency - since April 2019 and CURRENTLY....
- Senator Wyden & Senator Merkley - since August 2019 and CURRENTLY...
- Inspector General Michael Horowitz and many other DOJ/State/Federal/Military/Navy Seals - since December 2019...
- The Global Sports & Yogic Community at large, since November 2019...involving MANY Olympic Athletes across several Sports Disciplines and Global Locations.
- The Global & National AIA /AEC Community, at large beginning April 2019 - Current....

- I daily have very bad digestive issues from stress to be point of vomit, upon waking up daily.
- I have heart pains daily, due to the stress of being GANG-STALKED by Police for (2) YEARS straight.
- I am daily stressed, to coordinate living in my car and have NO access to consistent sanitation, whilst gathering Donations to store my lovely, quality (2) Bedroom Home Office since November 2018.
- I have limited access to food, due to being forced to survive on \$194 of SNAP AND UNLAWFULLY Denied Access to UI or SEA Program Benefits from the Covid-19 SBA Funding.
- I am now STERILE at the age of 37, due to (2) YEARS straight of Domestic Terrorism, beyond UNLAWFUL Blacklisting.
- Due to having to Represent myself, since ALL Oregon Attorneys are RACIST - I can not adequately maintain the daily AEC / Coaching knowledge I prefer....thus MORE time is being stolen from my life - from HATE.
- Living in your car and being further JUDGED by Caucasian Society, who acted in HATE to the point of making you HOMELESS - is very mentally exhausting, angering and IMMORAL.

***After over 25 years of Professional Competitive Athletics & Coaching in Aquatics / Traditional Yoga / Gymnastics - I can NOT fathom HOW those MANY apart of harming me, sleep at night and view themselves as "Christians", "good humans" or HUMANE at ALL - whether Black, White or Hindu.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

~ I am worth \$250,000 Annually as an over 15+ year Commercially-based, State Licensed Professional & Educator, who is now an Oregon Certified WBE/MBE Business Owner and multi-Credentialed Athletic/Wellness Coach.

~ I kindly Request the Judge to Order the Oregon Department of Justice to pay Restitutory Compensation Damages of: (3) years for Unlawful Employment Discrimination Reporting_Retalliation & Contribution to Unlawful PNW-AEC Blacklisting / (1) year for being apart of a Swatting Crime to protect the PNW-wide AEC Blacklisting, purposely causing Eugenics-style Medical Abuse during a CIA Investigation into the Corruption itself / + (5) years of Medical Damages of permanent damage done to Victim's entire Athletic body from Oregon DOJ efforts to cover-up: a) a Hate Crime in Astoria, b) Blacklisting c) Swatting Crime - due to the fact that for (5) years STRAIGHT - I've been Terrorized by ALL State / Oregon DOJ Officials in conjunction with each other ~ at horrific Municipal & Federal Levels akin to the Holocaust in Acts of Domestic Terrorism, Physical Violence, Financial Violence, and Police Gang-Stalking/heavy Surveillance which has continued for (2) years STRAIGHT.

*** (4) years of Damages valued at: a minimum of \$1 Million Dollars, plus Attorney's & Court Fees & State Taxes.

***PLUS ~ Ethics Violations Fines, ALL valued at 75% of (4) years Value, for another \$750,000 in Compensation for Victim / ***PLUS Medical Damages valued at \$10 Million Dollars, as I am now Sterile at the age of 37 from surviving extreme conditions forced on me.

a) MINIMUM Compensation Valued at: \$11.75 Million + Additional Fees listed above - for the Civil Case Alleging Negligance Case.

+

b) MINIMUM Compensation Valued at: \$11.75 Million + Additional Fees listed above - for the Violation of Civil Rights Case.

***I am willing to Settle out of Court, for immediate Damages of \$30 Million Dollars, in order to enable me to re-start my Life and restore ~ YEARS of Damages to all areas of my Personal & Professional endeavors, as well as Health and daily safety - due to the homelessness caused.

I ALSO kindly Request that the State of Oregon, via guidance from Nike, ZGF Architects and the Oregon AIA - to introduce NEW Commercial Interiors State Licensure. I'd like to be the 1st Oregon State Certified Interiors Professional.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 05/29/2020

Signature of Plaintiff Leanne J. Hensley

Printed Name of Plaintiff Leanne J. Hensley

B. For Attorneys

Date of signing: 05/29/2020

Signature of Attorney n/a

Printed Name of Attorney n/a

Bar Number n/a

Name of Law Firm n/a

Address PO Box 6166

Bend

City

Oregon

State

97708

Zip Code

Telephone Number 503 741 1616

E-mail Address leannejhensley@gmail.com